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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHARLES BUTLER, Individually and as
Assignees of TERRILYNN MORRISON,

Plaintiff,
vs.

PROGRESSIVE DIRECT INSURANCE
COMPANY; DOES I-V, and ROE
CORPORATIONS I-V, inclusive.

Defendants.

Case No: 2:23-cv-00566-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(Sixth Request)**

Defendant PROGRESSIVE DIRECT INSURANCE COMPANY and Plaintiff CHALRES BUTLER, through their respective counsel, submit the foregoing stipulation and order to extend discovery deadlines pursuant to LR 26-4 as follows:

1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	06/21/2023
Plaintiff's First Set of Interrogatories and Requests for Production to Defendant	06/22/2023
Defendant's Initial Rule 26(a) Disclosures	07/17/2023
Plaintiff's First Supplemental Rule 26(a) Disclosures	08/01/2023
Defendant's Responses to Plaintiff's First Set of Interrogatories and Requests for Production	08/04/2023
Plaintiff's Second Supplemental Rule 26(a)	08/11/2023

	Item	Date Completed
1	Disclosures	
2	Defendant's Supplemental Responses to Plaintiff's First Set of Interrogatories and Requests for Production	09/01/2023
3	Defendant's First Supplemental Rule 26(a) Disclosures	09/11/2023
4	Plaintiff's Third Supplemental Rule 26(a) Disclosures	09/14/2023
5	Defendant's Second Supplemental Rule 26(a) Disclosures	11/02/2023
6	Defendant's Third Supplemental Rule 26(a) Disclosures	11/03/2023
7	Defendant's Designation of Expert Witness	11/08/2023
8	Plaintiff's Fourth Supplemental Rule 26(a) Disclosures	01/10/2024
9	Defendant's Fourth Supplemental Rule 26(a) Disclosures	01/10/2024
10	Defendant's Fifth Supplemental Rule 26(a) Disclosures	01/19/2024
11	Defendant's Sixth Supplemental Rule 26(a) Disclosures	02/08/2024
12	Defendant's Seventh Supplemental Rule 26(a) Disclosures	02/09/2024
13	Defendant's Eighth Supplemental Rule 26(a) Disclosures	03/07/2024
14	Plaintiff's Sixth Supplemental Rule 26(a) Disclosures	03/11/2024
15	Plaintiff's Seventh Supplemental Rule 26(a) Disclosures	10/14/2024
16	Deposition of Stefani Aliberti (Rule 30(b)(6) Designee for Progressive)	10/22/2024
17	Defendant's Ninth Supplemental Rule 26(a) Disclosures	10/30/2024
18	Plaintiff's Eighth Supplemental Rule 26(a) Disclosures	10/31/2024

1 2. Discovery Remaining

2 The following discovery remains to be completed:

- 3 a) The deposition of Perla Ramos, previously noticed;
- 4 b) The deposition of Jacqueline Martinez, previously noticed;
- 5 c) The deposition of Amanda Nalder, previously noticed;
- 6 d) The deposition of Preston Rezaee, previously noticed;
- 7 e) The deposition of Israel Ruiz (ex-husband of Terry Morrison), currently scheduled for
January 3, 2025;
- 8 f) Deposition(s) of percipient witnesses;
- 9 g) Deposition of Defendant's expert witness;
- 10 h) Additional Written Discovery; and
- 11 i) Deposition of Plaintiff.

12 3. Reason Why Discovery Was Not Completed

13 Discovery in this matter is currently scheduled to close on January 6, 2025, shortly after the
holiday season. The Court's most recent Scheduling Order was filed on September 17, 2024.
Defendant filed a Motion for Summary Judgment on April 9, 2024 (Docket # 28). On November 21,
2024, the court issued an order granting leave for Plaintiff to file a Rule 56(d) Motion (Docket #49,
see also Docket #51). The Parties have agreed to extend the discovery deadlines in this matter to
allow Plaintiff to submit such motion and in anticipation that the Court may rule on the same prior to
the close of discovery. Depending on the outcome of that ruling, additional discovery costs might be
avoided. Additionally, the Parties anticipate that the holiday season will interrupt the time and
availability to conduct further discovery.

14 As such, the parties believe that good cause exists to justify extending the discovery
deadlines and hereby request a 60-day extension of the discovery deadlines to allow for additional
time to complete the remaining discovery.

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1 4. Proposed Schedule for Completing Discovery

2 Accordingly, the parties respectfully request that this Court enter an order setting the
 3 following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	July 11, 2023	No extension requested
Initial Expert Designations	November 8, 2023	No extension requested
Rebuttal Expert Designation	December 11, 2023	No extension requested
Discovery Cut-off	January 6, 2025	March 7, 2025
Dispositive Motions	February 3, 2025	April 4, 2025
Joint Pre-Trial Order	March 4, 2025	May 5, 2025

11 Counsel further state that the requested extension of discovery deadlines is not interposed for
 12 purposes of delay, but rather for the purposes set forth above.

13 DATED this 3rd day of December, 2024

14 DATED this 3rd day of December, 2024

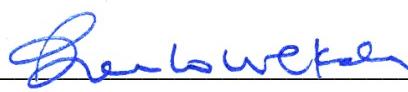
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21 **IT IS SO ORDERED.**

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 24 UNITED STATES MAGISTRATE JUDGE
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27 DATED this 4th day of December 2024.
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